REMARKS

Claims 66-127 were pending in this application.

All of the claims stand rejected.

By way of this amendment, the Applicant amends Claims 66, 78, 85, 92, 96, 101, 111, 119, and 123 and cancels claims 71, 79 and 106.

Accordingly, Claims 66 -69, 72-78, 80-104, and 107-127 are currently pending.

I. Rejection of Claims Under 35 U.S.C. § 102

Claims 85-91 and 111-118 remain rejected under Section 102 as being unpatentable over Amini.

By way of this amendment, the Applicant has amended independent claims 85 and 111 to more closely tie the queuing and management of the camera control system to the GUI interface that is absent from Amini.

Therefore, the Applicant respectfully requests that the Examiner withdraw the rejection and allow the claims as amended.

II. Rejection of Claims Under 35 U.S.C. § 103

Claims 66-69, 71-84, 92-104, 106-110 and 119-127 stand rejected as being obvious over Amini inview of U.S. Patent No. 6,538,663 issued to Kamei.

The Applicant respectfully submits that the present application contains subject matter that is patentable over the Amini and Kamei combination. The fundamental difference between the camera control system in Amini and Kamei and the claimed invention is the manner in how the camera control commands are being generated.

Comparing Fig. 4 of Kamei with that of Fig. 4 of the present application, it becomes evident that Kamei does not teach that the camera control commands are generated with respect to the position of a cursor within a control area in relation to an origin. As can be seen in

Fig. 4 of Kamei, the camera control commands are being generated through the use of buttons (22a-d and 26-31) that are located in a floating window (21). Kamei explicitly states on column 6, line 3-6 "that a user moves a cursor 40 with a mouse (not shown) provided in the input part 6 and clicks on one of the buttons 22a, 22b, 22c, 22d" (emphasis added). And further down in column 6, line 27, Kamei states:

> Buttons 28, 29, 30, and 31 are respectively used for instructing the controllable camera 12 to move its attitude upward, downward, leftward, and rightward. Buttons 26 and 27 are respectively used for varying the image pickup magnification of the controllable camera 12 toward its telephoto end and its wide-angle end.

Kamei generates the camera control commands by depressing virtual on-screen buttons. Kamei does not have an interactive control area (72) as taught by the present application and shown in Fig. 4. Moreover Kamei does not teach that the camera control commands are generated with respect to the position of the cursor (76) within the control area (72) relative to an origin (74) within the control area (72), as shown in Fig. 4 of the present application.

Similarly, Amini only teaches that the camera control commands are generated through "slider" and "VCR-type" button controls. As described previously, comparing Figs. 10A-10C in Amini with that of Fig. 4 of the present application reveals the stark differences between the inventions.

As can be seen in the Figs. 10A-10C in Amini, the camera control commands are being generated through use of buttons and slider-type controls. This is also fully supported in the disclosure at column 15, lines 45-65; column 14, lines 15-25 and lines 30-50; where Amini refers to "VCR-type controls," "activation of a button" and "point and click on button". The office action explicitly states, on pages 2-3, that scroll bars are used for camera control. Comparing Fig. 4 of the present application to Amini, the camera control commands in the present invention are not generated by buttons, sliders, or VCR-type controls, but by the more intuitive position of

a cursor (76) within a control area (72). This is also supported in the specification at paragraphs [0037] – [0043].

Furthermore, the speed and direction (Pan, tilt, zoom) of the camera control commands can be generated with respect to an origin point (74) and the distance of the cursor (76) to that origin point (74). Amini makes no mention of using cursor position to control the camera view, not even at column 8, lines 1-17 as the Examiner previously suggested. Column 8, lines 1-17 in Amini are referring to a program that returns the camera to a preset starting point after a user-defined period of inactivity by the operator to prevent the loss of surveillance data.

The use of a cursor (76) within a control area (72) provides significant advantages over a camera control system that uses buttons as disclosed in Amini or Kamei. First, it provides for finer and more precise control of the selected camera. Second, the interface of the present invention is more intuitive to use for the operators of the system because they can simply point to what they want to look at rather than adjust controls. Third, the system provides for a more fluid viewing experience, because the camera control commands are generated variably depending upon the distance and rate at which the cursor (76) is moved within the control area (72). The camera control system in Amini or Kamei is not capable of executing these features because of the inherent limitations of using buttons, slider controls, and other familiar or similar software controls and tools.

Therefore, the Applicant respectfully requests that the Examiner withdraw the rejection and allow the claims as amended.

III. Conclusion

The Applicant submits that Claims 66-69, 71-104, and 106-127, as amended, are allowable over the cited prior art. In view of the above, the Applicant submits that pending Claims 66-69, 71-104, and 106-127 are now in condition for allowance. The Applicant

respectfully requests that the Examiner reconsider the rejection and allow the claims as amended.

The Examiner is invited to telephone the undersigned should any questions arise.

Respectfully submitted,

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